

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Bankruptcy No. 19-23081-CMB
	:	
Richard Goldman and	:	Chapter 13
Kimberly Goldman,	:	
Debtors	:	
	:	Document No. 10
Richard Goldman and	:	
Kimberly Goldman,	:	
Movants	:	
	:	
vs.	:	
	:	
Ronda J. Winnecour Esquire	:	
Chapter 13 Trustee,	:	
Respondent	:	

MOTION TO EXTEND TIME FOR THE FILING OF THE COMPLETION
DATE OF THE FILING OF CHAPTER 13 PETITION, SCHEDULES, PROOF OF
INCOME, AND THE CHAPTER 13 PLAN

AND NOW comes the Debtor(s), Richard Goldman and Kimberly Goldman by and through their attorney, Lawrence W Willis, Esquire, and files the within Motion to Extend Time for the Filing of Chapter 13 Petition, Schedules, Proof of Income and Chapter 13 Plan and in support of avers as follows:

1. The Debtor(s) are Richard Goldman and Kimberly Goldman.
2. On August 3, 2019 the Debtor(s) filed a petition under Chapter 13 of the Bankruptcy Code at the above-referenced case number. At that time the Debtor(s) filed an "Emergency Filing" and received a Notice of Deficiencies indicating that certain Schedules, Chapter 13 Plan, and Proof of Income are due by August 19, 2019.
3. The Debtor(s) is obtaining additional information to submit to Counsel.

4. As a result of the above, Counsel for the Debtor(s) has not been able to gather all the required information of said Debtor(s) in a fashion to timely file completed schedules.
5. Counsel requests a reasonable extension of time to complete the Bankruptcy petition.
6. The Debtor(s) needs approximately ten (10) days in order to obtain all the information necessary for the completion of the filing.
7. Counsel expects to file the completion no later than August 30, 2019.

WHEREFORE, the Debtor(s) respectfully requests that this Honorable Court extend the time for the completion date for ten (10) days.

Respectfully submitted,

Date: August 16, 2019

By: /s/ Lawrence Willis Esquire
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